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### **REMARKS**

Claims 1 -19 and 23 are pending in the application. Favorable reconsideration of the application, as amended, is respectfully requested.

#### **I. REJECTION OF CLAIMS UNDER 35 USC § 103**

Claims 1 -19 and 23 stand rejected under 35 USC 103 as being unpatentable over US Patent 6,578,015 to Haseltine in view of US Published Application 2001/0051919 to Mason.

#### **General Discuss of Haseltine**

Haseltine teaches a system that enables billers (such as credit card companies, utilities, mortgage companies etc) to transmit bill data and bill format data to an electronic presentment and payment database (C4, L53-L57).

The bill format data defined by the biller enables the biller to maintain control of the "look-and-feel" of the presented bill such that the presented bill can mimic the biller's traditional paper bills (C5, L15-L20). The biller may define different biller format templates for different customers (C8, L17-22) and based on other template selection rules (C8, L30-L64) – however it must be appreciated the selection of the bill format still remains within control of the biller. A customer may view (only) their bills as formatted by the biller defined format data 404 (C6, L7-L9).

Haseltine does not teach presentation of billing data to the payer client in a predetermined document format corresponding to the payer client.

#### **General Discuss of Mason**

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Mason teaches an e-billing system 100 which works with a third party electronic bill statement and presentment system 200 [0021]. The e-billing system provides a file of customer billing data to the third party bill statement and presentment system [0021].

The third party statement and presentment system makes the invoices available on-line for customer access [0021].

Business rule criteria for calculating an early payment discount for customers is also transmitted to the third party bill statement and presentment system Figure 2, step 309 [0022]. This includes discount periods and one or more levels of discount percentages.

When a customer logs-on to the third party statement and presentment system, the customer's invoices is presented using a pre-built template. The presented invoice includes the early payment discount calculated in accordance with the business rule criteria [0024] – [0031].

Mason does not teach presentation of billing data to the payer client in a predetermined document format corresponding to the payer client.

### **Claim 1**

The applicant's invention relates to an electronic bill presentment and payment system. The system comprises an invoice loader receiving billing data and providing batch input of billing data to a billing database. The billing data comprises, for each of a plurality of bills, an amount due and settlement and payment options. The settlement and payment options comprise an indication of a discount if paid prior to a discount expiration date. The billing data is stored in a billing database.

An application server receives a plurality of instruction files each representing

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a transaction for at least one of reading and manipulating billing data. At least one instruction file represents a transaction for reading billing data comprising bills from multiple biller clients for a particular payer client with a defined discount expiration date. And, at least one instruction file represents a transaction for authorizing payment of the discounted amount on at least one of the bills from the multiple biller clients for the particular payer client with the defined discount expiration date.

The application server further performs each transaction utilizing data included in the instruction file and provides a data response file complying with a predetermined format. The response data file provided in response to a transaction for reading billing data comprising bills for the particular payer client with the defined discount expiration date include billing data for the bills from the multiple biller clients for the particular payer client with the defined discount expiration date.

A presentation server is coupled to the application server and includes a document database. The document database includes a plurality of document style sheets, each for presenting response data in a predetermined document format corresponding to one of the payer clients.

The presentation server receives the response file and generates a client document utilizing data extracted from the response file and the document style sheet corresponding to the client.

The presentation server further receives, from a payer client system, a selection to display invoices from the multiple biller clients for the payer client with a defined discount expiration date. In response thereto, the presentation server provides, to the application server, the instruction file representing a transaction for reading billing data comprising bills from the multiple biller clients for the particular payer client with the defined discount expiration date.

The presentation server further receives the response data file from the

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application server and populates a document style sheet in a predetermined document format corresponding to the payer client to generate a client document including billing data for the bills from the multiple biller clients for the particular payer client with the defined discount expiration date.

The presentation server further yet receives, from the payer client system, a selection to authorize payment of the discounted amount on at least one of the bills from the multiple biller clients for the particular payer client with the defined discounted expiration date.

The presentation server further provides, to the application server, the instruction file for paying the discounted amount on the at least one of the bills.

The application server further generates a payment transaction of the discounted amount on the at least one of the bills with the defined discount expiration date and manipulates the billing data to reflect settlement of such bills by payment of the discounted amount.

#### **At least one Distinction**

The examiner has cited Haseltine (C5, Lines 26-59) as teaching providing a client response document comprising the response data in a specified document formant corresponding to the payer client. The application respectfully asserts that Haseltine does not teach providing a client response document comprising the response data in a specified document formant corresponding to the payer client.

At C5, lines 12-17, Haseltine teaches that the biller uploads both a bill data stream 402 (e.g. bill data) and bill format data 404. The bill format data 404 may include HTMPL formatted data configured to mimic the "look-and-feel" of the biller's traditional paper bills. In other words, this is a document format defined by the biller.

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C5, lines 26-59 teach that alternatively, or in addition to HTML, the bill format data 404 may include XML. Lines 26-59 further teach loading of both the bill data 402 and the bill format data 404 to a staging area 420 and then transfer to an active area 430 after validation.

C6, lines 7-10 specifically teach that customers may have access to the active area 430, and may view (only) their own bill data 402 therein, as formatted by the bill format data 404 – which as stated above is defined by the biller.

Teaching formatting as defined by the biller is a teaching away from applications invention wherein the payer may obtain its bills from multiple billers, formatted in a predetermined document format corresponding to the payer. Further, neither Mason nor the other art of record teaches this aspect of applicant's invention.

#### **Claim 16**

Claim 16, as amended, relates to method of providing electronic bill presentment and payment services. The method comprises:

- A. Receiving an invoice file comprising billing data and populating a billing database with the billing data. The billing data comprises, for each of a plurality of bills, an amount due and settlement and payment options comprising an indication of a discount if paid prior to a discount expiration date.
- B. Receiving an instruction file from a client representing a transaction for reading, from the billing database, billing data comprising bills from multiple biller clients for a particular payer client with a defined discount expiration date.
- C. Performing the transaction utilizing data included in the instruction file to generate a client response document. The client response document comprises response data comprising billing data for the bills from the multiple biller clients for

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the particular payer client with the defined discount expiration date.

D. Providing a client response document comprising the billing data in a specified document format corresponding to the payer client.

E. Receiving an instruction file from the client, representing a transaction for authorizing payment of the discounted amount on at least one of the bills from the multiple biller clients for the particular payer client with the defined discount expiration date.

F. Performing the transaction utilizing data included in the instruction file to initiate payment of the discounted amount on the at least one of the bills and manipulating the billing data to reflect settlement of such at least one of the bills by payment of the discounted amount.

As discussed with respect to claim 1, neither Haseltine, Mason, nor the other art of record teaches provision of the client response document comprising the billing data in a specified document format corresponding to the payer client.

### **Claims 2-15, 17-19, and 23**

Each of claims 2-15, 17-19, and 23 depend from one of independent claims 1 or 16 and therefore can be distinguished over Haseltine, Mason and the other art of record for the same reasons. Further, the additional elements and or steps recited in such claims further distinguish such claims over Haseltine, Mason and the other art of record.

### **II. CONCLUSION**

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Accordingly, claims 1-19 and 23 are believed to be allowable and the application is believed to be in condition for allowance. A prompt action to such end is earnestly solicited.

Should the Examiner feel that a telephone interview would be helpful to facilitate favorable prosecution of the above-identified application, the Examiner is invited to contact the undersigned at the telephone number provided below.

Respectfully submitted,



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